



Federal Election Commission
Washington, DC 20463

March 7, 2011

Mark Braden, Esq.
Baker & Hostetler LLP
Washington Square, Suite 1100
1050 Connecticut Avenue, NW
Washington, DC 20036-5304

Re: ADR 549 (RAD 10L-10)
American Resort Development Association Resort Owners Coalition PAC and
the Committee's Treasurer

Dear Mr. Braden:

Enclosed is the signed copy of the agreement resolving the referral initiated on October 20, 2010 by the Federal Election Commission ("FEC/Commission") involving American Resort Development Association Resort Owners Coalition PAC and the Committee's Treasurer ("Respondents"). The agreement for ADR 549 (RAD 10L-10) was approved by the Commission on March 4, 2011 – the effective date of the agreement.

Note the specific time frames for compliance in **paragraph 6** of the agreement. **Please forward to this office, a statement confirming Respondent's compliance with the terms listed in the aforementioned agreement.** The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 6, and contain the ADR caption and case number. **The civil penalty payment should be sent to the attention of the Accounting/Finance Office of the FEC. The civil penalty under the agreement is due on or before April 4, 2011. Please put the ADR case number on the civil penalty check as well, to ensure crediting to the correct case.**

As you are aware, the settlement agreement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our entry into settlement negotiations and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

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This agreement resolves the matter that was initiated by the Commission pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities regarding violations of federal election campaign laws I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

Lynn M. Fraser, Director
Alternative Dispute Resolution Office
202-694-1665

Enclosure: Agreement

cc: Gwen Holmes, Finance and Accounting Office
Room 819

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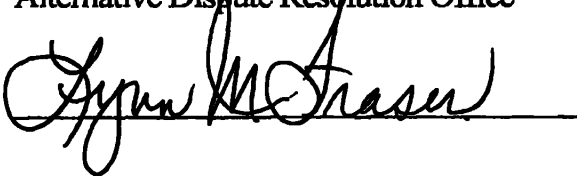
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date of this agreement; (b) set up a process to conduct monthly reconciliations of all financial transactions within thirty (30) day of the effective date of this agreement; and (c) pay a civil penalty of \$1,500 within thirty (30) days of the effective date of this agreement.

- 7. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
- 8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
- 9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this agreement as set out in paragraph 6 above.
- 10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 549 (RAD 10L-10), and resolves those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.


FOR THE COMMISSION:

Lynn M. Fraser, Director
Alternative Dispute Resolution Office



March 4, 2011
Date Signed

FOR THE RESPONDENTS:



Mark Braden, Esq.
Representing the American Resort Development
Association Resort Owners Coalition PAC and
its Treasurer

Feb 15 2011
Date Signed

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